



22 July 2005

To: Paul Dabbs

Statewide Planning Branch

California Department of Water Resources

P.O. Box 942836

Sacramento, Ca 94216-0001;

FAX (707) 651-9289; eMail pdabbs@water.ca.gov

RE: Draft California Water Plan Update

Dear Mr. Dabbs,

These are the comments of the Northcoast Environmental Center [NEC] regarding the above referenced California Water Plan Update [hereafter--UPDATE]. The NEC thanks the Department of Water Resources for developing the April 2005 draft UPDATE that represents that the state can easily meet its 2030 water needs regional solutions such as water conservation and water recycling.

While we appreciate the steps that the UPDATE makes towards water conservation and efficiency we would like to see the water savings translated into environmental improvements. What for example does the UPDATE do for the restoration of the Klamath-Trinity River salmon fisheries? What does it do for improving environmental conditions in the San Francisco Bay-Delta?

Because the history of water development in California includes substantial misrepresentations to various regions of the state as to the costs and benefits of water development, the UPDATE should identify impediments to realization of plan goals.

The CALFED plan calls for fixing Delta water quality problems, but they have not been fixed even with the expenditure of billions of taxpayer dollars. Now the Delta food chain is collapsing in contravention to Delta fix it plans. In short words on paper are meaningless or misleading if the reality in the world doesn't approximate the plan.

Knowledgeable environmentalists can never support more storage while water is being wasted in the state. Look how much resistance there was to requiring water meters for all in California. I've read that requiring the unmetered to get metered would likely cause the savings of 500-800K acre feet of water. That amount should

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equal what would be produced by a new storage facility. Raising Shasta Dam will not be a widely accepted option unless every non-storage strategy has deployed to its fullest extent.

In Northwestern California we are very sensitive to the decline of salmonid fish species. I personally photographed the horrific Klamath River salmon kill of 2002, and a kill in the upper Klamath of some 100,000 smaller fish species [chub and minnows] is being reported in the news today. What can the UPDATE do to assure that the Klamath-Trinity system is restored?

People here remember that the Bureau of Reclamation promised to protect the fisheries of the Trinity River, then contracted to give the vast majority of the flow to the Westlands Irrigation District, then the Department of the Interior and the Congress promised to fix it, then Westlands sued to stop it and now 50 years after the first bogus promises the river is finally getting some of its water back—all the while the BOR and the California Department of Water Resources is working to increase the prospective rate of Delta pumping.

Can the plan address the government's credibility problems?

One of the Klamath River water quality problems has to do with water quality in its tributaries, such as the Scott and Shasta Rivers where surface diversions and groundwater pumping combine to produce low, warm and nitrogen charged flows returning to the Klamath. Can the plan detail the relationship between surface water diversions and groundwater pumping as they impact water quality.

In the Klamath-Trinity Region live California's largest populations of American Indians. Many of these people live in the places that their ancestors before them lived, along the banks of the Klamath and Trinity Rivers. Once upon a time these people ate as much as 1.2 pounds of salmon daily. It is well understood today that this made for a particularly healthful diet. The Karuk tribe, second largest in California, in recent years has had to import salmon for their traditional world renewal ceremonies due to run decline.

The government has a trust responsibility to assure that healthy populations of salmon remain for the tribes that have treaty rights, and to achieve the goals of the federal clean water act that ask that our waters be fishable and swimmable. I'd like to see the final UPDATE reflect on its obligations to meet a standard of environmental justice.

Due to the likelihood of erratic weather associated with climate change the final UPDATE should discuss how the state will meet new extreme climate challenges.

Thank you for this opportunity to comment on this issue of huge importance.

Sincerely



Tim McKay, executive director  
Northcoast Environmental Center

enclosure